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Attorneys for Defendant-Counterclaimant
FREESCALE SEMICONDUCTOR, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

MEDIATEK INC.,

Plaintiff,

v.

FREESCALE SEMICONDUCTOR, INC.,

Defendant.

Civil Action No. 4:11-cv-05341 (YGR)

**JOINT STIPULATION TO
FREESCALE'S ADMINISTRATIVE
MOTION TO SEAL FREESCALE
CONFIDENTIAL INFORMATION IN
MEDIATEK'S STIPULATED
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL
[DKT. NO. 323]**

Hon. Yvonne Gonzalez Rogers

1 Defendant Freescale Semiconductor, Inc. (Freescale) and Plaintiff MediaTek Inc.
2 (MediaTek), through their undersigned counsel, hereby agree and stipulate as follows:

3 WHEREAS Freescale wishes to file an Administrative Motion to Seal Freescale
4 Confidential Information in MediaTek's Stipulated Administrative Motion to File Documents
5 Under Seal [Dkt. No. 323] in order to file under seal portions of the revised Exhibit 3 to the
6 Declaration of Brett Hammon (Exhibit 3) [Dkt. No. 323-15], attached to MediaTek's Notice of
7 Erratum [Dkt. No. 375];

8 WHEREAS the revised Exhibit 3 [Dkt. No. 323-15] contains information designated by
9 Freescale as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Amended
10 Protective Order in force in this action;

11 WHEREAS the parties met and conferred on this issue on December 23, 2013;

12 WHEREAS Freescale wishes to maintain the confidentiality of certain information
13 disclosed in the revised Exhibit 3 [Dkt. No. 323-15];

14 NOW THEREFORE, pursuant to Local Civil Rule 7-11, Freescale and MediaTek, by and
15 through their respective counsel of record, HEREBY STIPULATE AS FOLLOWS:

16 The revised Exhibit 3 [Dkt. No. 323-15] should be filed under seal.

17 IT IS SO STIPULATED.

18 Dated: December 23, 2013

Respectfully submitted,

19 FREESCALE SEMICONDUCTOR, INC.

20 By its attorneys,

21 /s/ Michelle Yang

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Dated: December 23, 2013

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Respectfully submitted,

MEDIATEK INC.

By its attorneys,

/s/ Christopher A. Franklin
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ATTESTATION OF E-FILED SIGNATURE

I, Michelle Yang, am the ECF User whose ID and password are being used to file this Stipulation. In compliance with General Order 45, X.B., I hereby attest that Christopher A. Franklin has concurred in this filing.

Dated: December 24, 2013

/s/ Michelle Yang
Michelle Yang